

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**MICHAEL PRYOR and KAREN PRYOR,**

Plaintiffs,

v.

**AVON PRODUCTS, INC.;**

**BARRETTS MINERALS INC.;**

**BAYER CONSUMER CARE HOLDINGS  
LLC f/k/a BAYER CONSUMER CARE LLC  
f/k/a MSD CONSUMER CARE, INC.);**

**BAYER HEALTHCARE LLC**, a subsidiary of  
BAYER AG;

**BLOCK DRUG COMPANY, INC.** (sued  
individually and as successor-in-interest to THE  
GOLD BOND STERILIZING POWDER  
COMPANY a/k/a THE GOLD BOND  
COMPANY);

**BLOCK DRUG CORPORATION** (sued  
individually and as successor-in-interest to THE  
GOLD BOND STERILIZING POWDER  
COMPANY a/k/a THE GOLD BOND  
COMPANY);

**BRENNTAG NORTH AMERICA, INC.** (sued  
individually and as successor-in-interest to  
MINERAL PIGMENT SOLUTIONS, INC. and as  
successor-in-interest to WHITTAKER CLARK &  
DANIELS, INC.);

**BRENNTAG SPECIALTIES, INC.** f/k/a  
MINERAL PIGMENT SOLUTIONS, INC. (sued  
individually and as successor-in-interest to  
WHITTAKER CLARK & DANIELS, INC.);

**CHARLES B. CHRYSTAL COMPANY, INC.;**

Case No. 3:21-cv-00118-BRM-LHG

Civil Action

Transferred from the Superior Court of New  
Jersey, Law Division, Middlesex County

Docket No.: MID-L-000022-21AS

**CONSENT ORDER TO REMAND**

**CHATTEM, INC.** (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);

**CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES INC.;

**CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉE LAUDER COMPANIES INC.;

**COLOR TECHNIQUES, INC.**;

**COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.);

**COTY, INC.** and its subsidiary NOXELL CORPORATION, for its CoverGirl line of products, and d/b/a RIMMEL LONDON and RIMMEL INC., for its Rimmel London line of products;

**CYPRUS AMAX MINERALS COMPANY** (sued individually, doing business as, and as successor to AMERICAN TALC COMPANY, METROPOLITAN TALC CO. INC. and CHARLES MATHIEU INC. and SIERRA TALC COMPANY and UNITED TALC COMPANY);

**CYPRUS MINES CORPORATION**;

**DR. SCHOLLS LLC**;

**ESTÉE LAUDER, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES, INC.;

**THE ESTÉE LAUDER COMPANIES, INC.** (sued individually and for LEN-RON MANUFACTURING CO. INC.);

**GLAXOSMITHKLINE LLC** (sued individually

and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);

**HIMMEL MANAGEMENT CO. LLC** a/k/a HIMMEL GROUP formerly d/b/a MARTIN HIMMEL, INC. (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);

**HONEYWELL INTERNATIONAL, INC.** f/k/a ALLIED-SIGNAL, INC. (sued as successor-in-interest to BENDIX CORPORATION);

**MARY KAY INC.;**

**MAYBELLINE LLC;**

**MERCK & CO., INC.;**

**MORSE TEC LLC** f/k/a BORGWARNER MORSE TEC LLC (sued as successor-by-merger to BORG WARNER CORPORATION);

**NOXELL CORPORATION**, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of products;

**PFIZER INC.;**

**PRESERSE CORPORATION;**

**PRESERSE INTERNATIONAL CORP;**

**THE PROCTER & GAMBLE COMPANY** (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY and its CoverGirl line of products);

**REVLON CONSUMER PRODUCTS**

**CORPORATION;**

**SCHOLLS WELLNESS COMPANY LLC;**

**SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.);

**UNILEVER UNITED STATES, INC.** formerly d/b/a RIMMEL LONDON and for its Rimmel line of products;

**UNION CARBIDE CORPORATION;**

**WHITTAKER CLARK & DANIELS, INC.;**

**JOHN DOE CORPORATIONS 1-50**  
(fictitious);

Defendants.

**Whereas,** Plaintiffs filed a Complaint in the Superior Court of New Jersey, Law Division, Middlesex County (Docket No. MID-L-000022-21AS), on January 4, 2021;

**Whereas,** Plaintiffs personally served Defendant Brenntag Specialties, Inc., whose principal place of business is located in New Jersey, with a copy of the Summons and Complaint at 2:55 p.m. on January 4, 2021;

**Whereas,** on January 5, 2021, Defendant Revlon Consumer Products Corporation (“Revlon”) filed with this Court a Notice of Removal Pursuant to 28 U.S.C. §1442 and §1332;

**Whereas,** counsel for the Plaintiffs and counsel for Revlon have conferred and agree that this case should be forthwith remanded to the Superior Court of New Jersey, Law Division, Middlesex County;

**IT IS HEREBY ORDERED** on this 7TH day of January 2021, that Plaintiffs' Complaint be and is hereby remanded to the Superior Court of New Jersey, Law Division, Middlesex County; and it is further

**ORDERED** that a copy of this Order be served on all counsel of record within seven days.



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Hon. Brian Martinotti, U.S.D.J.

Agreed as to form and substance

Agreed as to form and substance

\_\_\_\_\_  
/s/ Robert E. Lytle  
Robert E. Lytle  
Counsel for Plaintiffs

\_\_\_\_\_  
/s/ Deena M. Crimaldi  
Deena M. Crimaldi  
Counsel for Revlon